

MARK C. MOLUMPY (SBN No. 168009)
mmolumphy@cpmlegal.com
TYSON C. REDENBARGER (SBN No. 294424)
tredenbarger@cpmlegal.com
ELLE D. LEWIS (SBN No. 238329)
elewis@cpmlegal.com
COTCHETT, PITRE & McCARTHY, LLP
San Francisco Airport Office Center
840 Malcolm Road
Burlingame, CA 94010
Telephone: (650) 697-6000
Facsimile: (650) 697-0577

TINA WOLFSON (SBN 174806)
twolfson@ahdootwolfson.com
ROBERT R. AHDOOT (SBN 172098)
rahdoot@ahdootwolfson.com
THEODORE MAYA (SBN 223242)
tmaya@ahdootwolfson.com
AHDOOT & WOLFSON, PC
2600 West Olive Avenue, Suite 500
Burbank, California 91505
Telephone: (310) 474-9111

Co-Lead Counsel for Plaintiffs and the Settlement Class

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: ZOOM VIDEO COMMUNICATIONS,
INC. PRIVACY LITIGATION

CASE No. 3:20-cv-02155-LB

This Document Relates To:

All Actions

**JOINT DECLARATION OF MARK
MOLUMPY AND TINA WOLFSON IN
SUPPORT OF PLAINTIFFS' MOTION FOR
APPEAL BOND**

Judge: Hon. Laurel Beeler
Date: April 27, 2023
Time: 9:30 a.m.
Location: Courtroom B, 15th Floor

1 We, Mark Molumphy and Tina Wolfson, hereby declare and state as follows:

2 1. We are over the age of eighteen and am fully competent to make this declaration. We
3 make this declaration based upon personal knowledge, and if called to testify as a witness, could and
4 would competently testify to the matters stated herein.

5 2. We are attorneys admitted to practice in the State of California and in the United States
6 District Court for the Northern District of California and other federal district courts. We are members
7 at the law firm of Cotchett, Pitre & McCarthy and Ahdoot & Wolfson, PC, and have been appointed
8 as Co-Lead Counsel representing Plaintiffs and the Settlement Class in this action (“Plaintiffs”).

9 3. Plaintiffs served a document subpoena on Shipping & Beyond, located at 1440 W.
10 Taylor Street, Chicago, Illinois, the address provided by Alfred Gonzalez on his Notice of Appeal, and
11 asking for various categories of documents, including his identification and residence. The documents
12 produced included Gonzalez’ application and identification card with a Nicaraguan home address, and
13 an affiliation with Beacon Redevelopment located in Managua, Nicaragua.

14 4. Gonzalez has not yet provided our offices, or the Claims Administrator, with any
15 evidence that he is a member in the Settlement Class. There is no record of any claim submitted by
16 Gonzalez, nor did he object to the underlying settlements with the objectors, including the settlement
17 negotiated by J. Allen Roth. However, on information and belief, Gonzalez may be affiliated with Mr.
18 Roth. According to the Colorado Secretary of State, “Alfredo I Gonzalez” from Managua, Nicaragua,
19 filed a Statement of Trade Name of a Reporting Entity on behalf of Hotels and Stuff, Inc., a Colorado
20 corporation. Our search of federal court dockets on PACER indicates that Mr. Roth represented Hotels
21 and Stuff Inc. in litigation in the Western District of Pennsylvania.

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1 5. Based on the Rule 39 of the Federal Rules of Appellate Procedure and Circuit Rule 39-
2 1, and our firms' past expenses in other recent Ninth Circuit appeals, we conservatively estimate that
3 the costs for preparing the record, and printing, copying, and mailing the briefs in this appeal will be at
4 least \$8,500.

5 We declare under penalty of perjury that the foregoing is true and correct. Executed on this
6 10th day of March 2023, by Mark C. Molumphy in Burlingame, California Tina Wolfson in Los
7 Angeles, California.

8
9 /s/ Mark C. Molumphy
10 Mark C. Molumphy

/s/ Tina Wolfson
 Tina Wolfson

SIGNATURE ATTESTATION

I am the ECF User whose identification and password are being used to file the foregoing Joint Declaration of Wolfson and Molumphy in support of Motion for Motion for Appeal Bond. Pursuant to L.R 5-1(i)(3) regarding signatures, I, Mark C. Molumphy attest that concurrence in the filing of this document has been obtained.

DATED: March 10, 2023

/s/ Mark C. Molumphy

Mark C. Molumphy